

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN (DUBUQUE) DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,) Case No.: 19-CR-1015
vs.)
CHRISTIAN M. DELATORRE,) DEFENDANT'S SENTENCING
Defendant.) MEMORANDUM

Christian M. Delatorre, through counsel, hereby submits the following sentencing memorandum for the sentencing set at 9:30 a.m. on April 20, 2020.

I. Witnesses

Mr. Delatorre does not anticipate calling any witnesses at the sentencing hearing.

II. Exhibits

Mr. Delatorre anticipates submitting these exhibits at the sentencing hearing:

- A. Letter from RoseAnna Abell
- B. Letter from Ian Kauffman

III. Issues

The presentence report identified one potential issue to be resolved at the sentencing hearing; whether the Court should depart upward pursuant to USSG § 3A1.21.¹ Official Victim, since Donald Trump is the victim. However, the government will not be seeking this enhancement. Further, Mr. Delatorre will not be requesting a downward variance. The parties

¹ The presentence report erroneously cited USSG § 3A1.3 as the appropriate section.

will each request a sentence within Mr. Delatorre's guidelines range.

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CERTIFICATE OF SERVICE

I hereby certify that on April 13, 2020, I electronically filed this document with the Clerk of Court using the ECF system which will serve it on the appropriate parties.

By: /s/ Angie McClain